

Distribution Integrity Management Program (DIMP)

Operator of Gas Distribution System

Nashville

Operator ID: **13030**
Operator: **NASHVILLE, CITY OF**
Address: **190 N EAST COURT STREET, NASHVILLE, IL 62263**
(618) 475-2544

Inspection ID: **20**
Report Date: **5/1/2014**
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States(s) included in this Inspection:

Illinois

Agency Representatives:

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Persons Interviewed:

Blaine Middleton, Utility Superintendent, 6183278918,
nashvillepw@sbcglobal.net

Inspector Comments:

Q. No.:	Rule Name:	Question	Answer	Details	Comments
1	192.1005	Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011? OR For a gas system put into service or acquired after 08/02/2011, was a plan written and implemented prior to beginning of operation?	Yes or Satisfactory	Nashville uses SHRIMP and at the time the DIMP plan was initiated, SHRIMP did not track the implementation date.	
2	Information Only	Were commercially available product(s)/templates used in the development of the operator's written integrity management plan? Commercial product(s)/templates name if used:	Yes or Satisfactory Fully	SHRIMP	
3	Information Only	Does the operator's plan assign responsibility, including titles and positions, of those accountable for developing and implementing required actions?	Yes or Satisfactory	This information is located in Chapter 1.1 and 11.1 A.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
4	192.1007(a)(1)	Do the written procedures identify or reference the appropriate sources used to determine the following characteristics necessary to assess the threats and risks to the integrity of the pipeline:			
sources used to			Design (e.g. type of construction,	Yes or Satisfactory	The
		inserted pipe, rehabilitated pipe method, materials, sizes, dates of installation, mains and services, etc.)?		assess threats and risks for design considerations are listed in Chapter 8.	
		Operating Conditions (e.g. pressure, gas quality, etc.)?	Yes or Satisfactory	The sources used to assess threats and risks for operating conditions considerations are listed in Chapter 8.	
		Operating Environmental Factors (e.g. corrosive soil conditions, frost heave, land subsidence, landslides, washouts, snow damage, external heat sources, business districts, wall-to-wall paving, population density, difficult to evacuate facilities, valve placement, etc.)?	Yes or Satisfactory	The sources used to assess threats and risks for operating environmental factors considerations are listed in Chapter 8.	
5	192.1007(a)(2)	Do the written procedures require the consideration of information gained from past design, operations, and maintenance (e.g. O&M activities, field surveys, One-Call system information, excavation damage,	Yes or Satisfactory	Chapter 8 contains the necessary records to be reviewed to determine past design, operations, and maintenance activities.	
6	Information Only	Do the written procedures indicate if the information was obtained from electronic records, paper records, or subject matter expert knowledge (select all which apply)?	Paper - SME	Chapter 3 included paper records along with three SME's were used in the development of the plan.	
		Electronic, Paper, SME			
7	192.1007(a)(3)	Does the plan contain written procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?	Yes or Satisfactory	The procedure is listed in Chapter 11.1 C.	
8	192.1007(a)(3)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?	Yes or Satisfactory	Chapter 11.1 C requires Nashville to fill out a DIMP Corrections form to capture the missing, inaccurate or incomplete records.	
9	192.1007(a)(3)	Do the written procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)?	Yes or Satisfactory	Chapter 11.1 C requires Nashville employees to submit a DIMP Corrections form when discrepancies are found in the field or through record reviews.	
10	192.1007(a)(5)	Do the written procedures require the capture and retention of data on any new pipeline installed?	Yes or Satisfactory	Chapter 3 lists the requirement that all newly installed pipe will be entered on a Main and Service Installation form and included in DIMP.	Staff discussed with the Utility Superintendent that when new pipe is installed that Nashville will remove the stickers with all pertinent information for each fitting and attach it to the service record. The lot number is added to the sticker.
11	192.1007(a)(5)	Does the data required for capture and retention include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed?	Yes or Satisfactory	Staff reviewed the Main and Service Installation form and it contains the required material.	
12	192.1007(a)	Does the documentation provided by the operator demonstrate implementation of the element "Knowledge of the System"?	Yes or Satisfactory	Nashville uses SHRIMP and Staff reviewed a portion of the answers used to populate SHRIMP.	
13	192.1007(a)	Has the operator demonstrated an understanding of its system?	Yes or Satisfactory	Staff discussed the various attributes of the system with Blaine Middleton.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
14	192.1007(b)	In identifying threats, do the written procedures include consideration of the following categories of threats to each gas distribution pipeline?			
		Corrosion	Yes or Satisfactory	This information is located in Chapter 4.2.1	
		Natural Forces	Yes or Satisfactory	This information is located in Chapter 4.2.6	
		Excavation Damage	Yes or Satisfactory	This information is located in Chapter 4.2.3	
		Other Outside Force Damage	Yes or Satisfactory	This information is located in Chapter 4.2.7	
		Material or Welds	Yes or Satisfactory	This information is located in Chapter 4.2.5	
		Equipment Failure	Yes or Satisfactory	This information is located in Chapter 4.2.2	
		Incorrect Operation	Yes or Satisfactory	This information is located in Chapter 4.2.4	
		Other Concerns	Yes or Satisfactory	This information is located in Chapter 4.2.8	
15	192.1007(b)	Did the operator consider the information that was reasonably available to identify existing and potential threats?	Yes or Satisfactory	Staff reviewed the list of records used in Chapter 4 to identify existing and potential threats.	
16	Information Only	Does the plan subdivide the primary threats into subcategories to identify existing and potential threats?	Yes or Satisfactory	Chapter 4 does break down primary threats into subcategories.	
17	192.1007(b)	Incident and leak history	Yes or Satisfactory		
		Corrosion control records	Yes or Satisfactory		
		Continuing surveillance records	Yes or Satisfactory		
		Patrolling records	Yes or Satisfactory		

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Maintenance history	Yes or Satisfactory		
		Excavation damage experience	Yes or Satisfactory		
		Other – Describe	No or Unsatisfactory	Nashville does list various records that are reviewed to determine if there are threats that may be considered Other, but at this time there are no threats to the system that would be considered Other.	
		In identifying threats did the information considered include any of the following?	Yes or Satisfactory	The following records are listed throughout Chapter 4.	Nashville does list various records that are reviewed to determine if there are threats that may be considered Other, but at this time there are no threats to the system that would be considered Other.
18	Information Only	Does the plan categorize primary threats as either “system-wide” or “localized”?	Some of Both	Staff reviewed the question and answer section to determine that some threats are throughout the system, like excavation damage, where other threats are localized to an area, like copper services.	Staff reviewed the question and answer section to determine that some threats are throughout the system, like excavation damage, where other threats are localized to an area, like copper services.
19	Information Only	Do the written procedures consider, in addition to the operator’s own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats?	Yes or Satisfactory	Chapter 4.1 lists the following items: PHMSA Advisory Bulletins, PHMSA Annual and Incident Reports, Data on leak repair rates from all SHRIMP users, AGA, APGA, and Midwest Energy Association.	
20	192.1007(b)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the documentation provided by the operator demonstrate implementation of the element "Identify Threats"?	Yes or Satisfactory	Nashville uses SHRIMP, which considers the various threats, and the threats were subdivided into regions when appropriate.	
21	Information Only	Was the risk evaluation developed fully or in part using a commercially available tool?	Fully	SHRIMP	
		Commercial tool name if used:			
22	192.1007(c)	Do the written procedures contain the method used to determine the relative importance of each threat and estimate and rank the risks posed? Briefly describe the method.	Yes or Satisfactory	Nashville utilizes SHRIMP for determining the relative importance of each threat.	
23	192.1007(c)	Do the written procedures to evaluate and rank risk consider:			
		Each applicable current and potential threat?			
		Corrosion	Yes or Satisfactory		The procedures are defined in Chapter 11.3.2 Relative Risk Model.
		Natural Forces	Yes or Satisfactory		
		Excavation Damage	Yes or Satisfactory		
		Other Outside Force Damage	Yes or Satisfactory		
		Material or Welds	Yes or Satisfactory		
		Equipment Failure	Yes or Satisfactory		
		Incorrect Operation	Yes or Satisfactory		
		Other Concerns	Yes or Satisfactory		
24	192.1007(c)	Do the written procedures to evaluate and rank risk consider:			
		The likelihood of failure associated with each threat?			
		Corrosion	Yes or Satisfactory		The procedures are defined in Chapter 11.3.2 Relative Risk Model.

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Natural Forces	Yes or Satisfactory		
		Excavation Damage	Yes or Satisfactory		
		Other Outside Force Damage	Yes or Satisfactory		
		Material or Welds	Yes or Satisfactory		
		Equipment Failure	Yes or Satisfactory		
		Incorrect Operation	Yes or Satisfactory		
		Other Concerns	Yes or Satisfactory		
25	192.1007(c)	Do the written procedures to evaluate and rank risk consider: The potential consequence of such a failure? Corrosion	Yes or Satisfactory		The procedures are defined in Chapter 11.3.2 Relative Risk Model.
		Natural Forces	Yes or Satisfactory		
		Excavation Damage	Yes or Satisfactory		
		Other Outside Force Damage	Yes or Satisfactory		
		Material or Welds	Yes or Satisfactory		
		Equipment Failure	Yes or Satisfactory		
		Incorrect Operation	Yes or Satisfactory		
		Other Concerns	Yes or Satisfactory		
26	192.1007(c)	If subdivision of system occurs, does the plan subdivide the system into regions with similar characteristics and for which similar actions are likely to be effective in reducing risk? Briefly describe the approach.	Yes or Satisfactory	Staff reviewed the question and answer section of SHRIMP and determined the questions refer to subdividing the system either in a business district or outside of a business district.	
27	Information Only	Is the method used to evaluate and rank risks reasonable?	Yes or Satisfactory	Staff reviewed Chapter 11.3.2 Relative Risk Model, which contains the method to evaluate and rank risks.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
28	192.1007(c)	Are the results of the risk ranking supported by the risk evaluation model/method?	Yes or Satisfactory	Staff reviewed the risk ranking and compared the weighting factors to the Relative Risk Model.	
29	192.1007(c)	Did the operator validate the results generated by the risk evaluation model/method? Briefly describe.	Yes or Satisfactory	Staff reviewed and discussed the ranking of the risks with the operator. The risks appear to be the highest risks and the explanations used confirm that result.	
30	192.1007(c)	Does the documentation provided by the operator demonstrate implementation of the element "Evaluate and Rank Risk"?	Yes or Satisfactory	Staff reviewed the risk ranking and when the rank was overridden then an explanation was added detailing the change.	
31	192.1007 (d)	Does the plan include procedures to identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk?	Yes or Satisfactory	For each threat category, SHRIMP offers one additional action that the operator can choose. The additional actions exceed Part 192 requirements. If the operator decides an additional action is different then the one pre-populated by SHRIMP then the operator may add the language into the SHRIMP question posed.	
32	192.1007 (d)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing?	Yes or Satisfactory	The Accelerated Actions listed in Chapter 11.5.2 for each risk were reviewed. The AA's do list how each will be implemented along with the risk the AA is associated.	
34	192.1007 (d)	Locate the leaks in the distribution system;	Yes or Satisfactory	Chapter 6.1 refers to the O&M Section 13 Part C or Section 2 Parts I and J.	
		Evaluate the actual or potential hazards associated with these leaks;	Yes or Satisfactory	Chapter 6.1 refers to the O&M Section 13 Parts D and E.	
		Act appropriately to mitigate these hazards;	Yes or Satisfactory	The leak classification and action criteria outlined by GPTC stipulates the steps to be taken when either a Class 1, 2, or 3 leak is discovered.	
		Keep records;	Yes or Satisfactory	Chapter 6.1 requires the records to be retained for 10 years.	
		Self-assess to determine if additional actions are necessary to keep people and property safe.	Yes or Satisfactory	Staff reviewed leak tickets and the repairs were made shortly after discovery. The leaks are not pending until a follow-up is required. All leaks appear to be repaired promptly after discovery.	
		Does the plan include an effective leak management program (unless all leaks are repaired when found)	Yes or Satisfactory	Nashville has adopted GPTC's guidelines for leak classification and action criteria.	

35 192.1007 (d)

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the documentation provided by the operator demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk?	Yes or Satisfactory	Staff discussed with the Utility Superintendent the locate activities that occurred in Nashville in the previous year. A company installed fiber optic to multiple businesses in Nashville. This work was accomplished by use of directional boring techniques. The Nashville employees responded and observed when their facilities were crossed using the directional bore machine. Nashville required the contractor to expose the facilities by way of potholing. Staff also discussed that whenever a leaking underground valve is discovered that all of the bolts are replaced and torqued to the manufacturer's specifications.	
36	192.1007 (e)	Does the plan contain written procedures for how the operator established a baseline for each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	The information is located in Chapter 11.3	
		ii) Number of excavation damages?	Yes or Satisfactory	The information is located in Chapter 11.3	
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	The information is located in Chapter 11.3	
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	The information is located in Chapter 11.3	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
37	192.1007 (e)	v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	The information is located in Chapter 11.3	
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	The information is located in Chapter 11.3	
		Does the plan establish a baseline for each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	The information is located in Chapter 7.1	
		ii) Number of excavation damages?	Yes or Satisfactory	The information is located in Chapter 7.1	
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	The information is located in Chapter 7.1	
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	The information is located in Chapter 7.1	
38	192.1007 (e)	v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	The information is located in Chapter 7.1	
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?		The information is located in Chapter 7.1	
		Does the operator have written procedures to collect the data for each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	The information is located in Chapter 7.1	
		ii) Number of excavation damages?	Yes or Satisfactory	The information is located in Chapter 7.1	
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	The information is located in Chapter 7.1	
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	The information is located in Chapter 7.1	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	The information is located in Chapter 7.1	
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	The information is located in Chapter 7.1	
39	192.1007 (e)	Do the written procedures require the operator to monitor each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	The information is located in Chapter 7.1	
		ii) Number of excavation damages?	Yes or Satisfactory	The information is located in Chapter 7.1	
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	The information is located in Chapter 7.1	
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	The information is located in Chapter 7.1	
		v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	The information is located in Chapter 7.1	
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	The information is located in Chapter 7.1	
40	192.1007 (e)				
		When measures are required to reduce risk, do the written procedures provide how their effectiveness will be measured?	Yes or Satisfactory	The information is located in Chapter 7.2	
41	Information Only				
		Can the performance measures identified by the operator in the plan be counted, monitored, and supported?	Yes or Satisfactory		
42	192.1007 (e)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the documentation provided by the operator demonstrate implementation of the element “Measure Performance, Monitor Results, and Evaluate Effectiveness”?	Yes or Satisfactory	Staff reviewed the previous two years of Annual Reports and determined the baselines were not increased above the limits stated in the DIMP.	
43	192.1007 (f)	Do the written procedures for periodic review include:			
8 requires a		a.	Frequency of review based on	Yes or Satisfactory	Chapter
		the complexity of the system and changes in factors affecting the risk of failure, not to exceed 5 years?		re-evaluation of the DIMP annually.	
		b. Verification of general information (e.g. contact information, form names, action schedules, etc.)?	Yes or Satisfactory	The requirement is located in Chapter 8.	
		c. Incorporate new system information?	Yes or Satisfactory	The requirement is located in Chapter 8.	
		d. Re-evaluation of threats and risk?	Yes or Satisfactory	The requirement is located in Chapter 8.	
		e. Review the frequency of the measures to reduce risk?	Yes or Satisfactory	The requirement is located in Chapter 8.	
		f. Review the effectiveness of the measures to reduce risk?	Yes or Satisfactory	The requirement is located in Chapter 8.	
requirement is		g.	Modify the measures to reduce	Yes or Satisfactory	The
		risk and refine/improve as needed (i.e. add new, modify existing, or eliminate if no longer needed)?		located in Chapter 8.	
requirement is		h.	Review performance measures,	Yes or Satisfactory	The
		their effectiveness, and if they are not appropriate, refine/improve them?		located in Chapter 8.	
44	Information Only	Does the plan contain a process for informing the appropriate operating personnel of an update to the plan?	Yes or Satisfactory	The requirement to notify operating personnel of an update is located in Chapter 11.1 C.	
45	Information Only				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the plan contain a process for informing the appropriate regulatory agency of a significant update to the plan?	Yes or Satisfactory	In the Revisions section there is a requirement when any changes are made to the plan then a copy will be forwarded to the Illinois Commerce Commission.	
46	192.1007 (f)	Does the documentation provided by the operator demonstrate implementation of the element "Periodic Evaluation and Improvement"?	Yes or Satisfactory	Staff reviewed the DIMP plan and the associated records to determine leaks and other issues have decreased. Appropriate actions appear to have taken place and improved the operation of the gas system.	
47	192.1007 (g)	Does the plan contain or reference procedures for reporting, on an annual basis, the four measures listed in 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by § 191.11 and the State regulatory authority?	Yes or Satisfactory	Chapter 9 contains the requirement to submit the annual report data.	
48	Information Only	When required by the State, does the plan identify the specific report form, date, and location where it is to be submitted?	Yes or Satisfactory	Chapter 9 contains the requirement to submit the required forms (by number) to PHMSA and the date when submission is required. In addition, the Annual Report is required to be forwarded to the Illinois Commerce Commission and includes the mailing address.	
49	192.1007 (g)	Has the operator submitted the required reports?	Yes or Satisfactory		
50	192.1009				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the operator have written procedures to collect the information necessary to comply with the reporting requirements of 192.1009?	Yes or Satisfactory	Chapter 9 contains the requirement to collect the necessary information to populate the requirement as established by 192.1009.	
51	192.1011	Does the operator have written procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years?	Yes or Satisfactory	Chapter 10 contains the requirement that all records will be maintained for 10 years.	
52	192.1011	Does the operator have written procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years?	Yes or Satisfactory	Chapter 10 contains the requirement that all superseded plans will be maintained for 10 years.	
53	192.1011	Has the operator maintained the required records?	Yes or Satisfactory	Staff reviewed that Nashville has maintained the previous versions of the plan. Also, Staff discussed that all records related to the DIMP are required to be maintained for a minimum of ten years.	
54-1	192.1007 (d)	<p>1. For the top five highest ranked risks from the operator's risk ranking list the following:</p> <p>Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);</p> <p>Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);</p>	<p>Excavation damage</p> <p>Third party</p>		

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		Monitor/audit excavation activity.	
		Associated performance measure.		Track the frequency of failures	
54-2	192.1007 (d)	2. For the top five highest ranked risks from the operator's risk ranking list the following:			
		Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Corrosion		Staff spoke with the operator about the copper replacement program. Currently, all known copper services have been replaced. The operator has decided to keep this threat in the DIMP plan because of possibly unknown copper services.
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);	External - Copper		
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		All copper services are in a replacement program.	
		Associated performance measure.		Track the number of leaks caused by external corrosion	
54-3	192.1007 (d)	3. For the top five highest ranked risks from the operator's risk ranking list the following:			
		Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Natural forces		
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);	Water/Flood		

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		None was chosen. The operator considers natural forces to be a threat throughout its system. SHRIMP had to be overridden to make this a threat and the threat can occur at any time. Due to this fact, the operator considers this a larger threat than the remaining threats which have to do with leaks on valves.	
		Associated performance measure.		Track the number of leaks or failures due to natural forces.	
54-4	192.1007 (d)	4. For the top five highest ranked risks from the operator's risk ranking list the following:			
		Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Equipment failure		
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);	Valves - steel	Kerotest gate valve 1.25", 500, gv60, 1983	
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		Leaking 1.25" Kerotest M1 gate valves installed in 1983 that cannot be fixed by greasing or tightening will be removed.	
		Associated performance measure.		Track the frequency of these failures.	
54-5	192.1007 (d)	5. For the top five highest ranked risks from the operator's risk ranking list the following:			

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Equipment failure		
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);	Valves - steel	Kerotest gate valve 2", 665, gv137, 1986	
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		Leaking 2" Kerotest M1 gate valves installed in 1986 that cannot be fixed by greasing or tightening will be removed.	
		Associated performance measure.		Track the frequency of these failures.	